

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS
CORPORATION, et al.

Defendants.

C.A. No. 06-726-JJF
C.A. No. 07-357-JJF

CONSOLIDATED CASES

**LG DISPLAY CO., LTD.'S ANSWER TO
CHI MEI OPTOELECTRONICS CORPORATION'S COUNTERCLAIMS TO
THE COMPLAINT OF LG DISPLAY CO., LTD.**

LG Display, Co., Ltd. ("LG Display"), by and through its undersigned counsel, hereby files its Answer in Response to Chi Mei Optoelectronics Corporation's Counterclaims to the Complaint of LG Display in the above titled action, filed on May 14, 2008 as D.I. 204.

RESPONSE TO ALLEGATIONS AS TO THE COUNTERCLAIMS

1. The allegations in paragraph 1 of the Counterclaims are conclusions of law to which no response is required.
2. The allegations in paragraph 2 of the Counterclaims are conclusions of law to which no response is required.
3. LG Display admits the allegations of paragraph 3 of the Counterclaims.
4. LG Display denies the allegations of paragraph 4 of the Counterclaims.
5. The allegations in paragraph 5 of the Counterclaims are conclusions of law to which no response is required.

RESPONSE TO ALLEGATIONS AS TO THE PARTIES

6. LG Display admits the allegations of paragraph 6 of the Counterclaims.
7. LG Display admits the allegations of paragraph 7 of the Counterclaims.

RESPONSE TO ALLEGATIONS AS TO JURISDICTION AND VENUE

8. LG Display admits that these Counterclaims are asserted under the Declaratory Judgment Act and the Patent Laws, but denies the remaining allegations of paragraph 8 of the Counterclaims.

9. LG Display admits the allegations of paragraph 9 of the Counterclaims.
10. LG Display admits the allegations of paragraph 10 of the Counterclaims.
11. LG Display admits the allegations of paragraph 11 of the Counterclaims.

RESPONSE TO COUNTERCLAIM COUNT III

12. LG Display refers to and incorporates herein its responses to CMO's allegations in paragraphs 1-11, above, as though fully set forth herein.

13. LG Display denies the allegations in paragraph 13 of the Counterclaims.
14. LG Display denies the allegations in paragraph 14 of the Counterclaims.

RESPONSE TO COUNTERCLAIM COUNT IV

15. LG Display refers to and incorporates herein its responses to CMO's allegations in paragraphs 1-14, above, as though fully set forth herein.

16. LG Display denies the allegations in paragraph 16 of the Counterclaims.
17. LG Display denies the allegations in paragraph 17 of the Counterclaims.
18. LG Display denies the allegations in paragraph 18 of the Counterclaims.
19. LG Display denies the allegations in paragraph 19 of the Counterclaims.

RESPONSE TO UNNUMBERED PARAGRAPH

As to the unnumbered paragraph, including subparagraphs (a) through (e), LG Display denies the allegations contained therein and denies that CMO is entitled to the requested relief.

June 6, 2008

BAYARD, P.A.

/s/ Richard D. Kirk (rk0922)
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CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on June 6, 2008, he served the foregoing documents by email and by hand upon the following counsel:

| | |
|--|---|
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|--|---|

The undersigned counsel further certifies that, on June 6, 2008, he served the foregoing documents by email and by U.S. Mail upon the following counsel:

| | |
|--|--|
| Jonathan S. Kagan IRELL & MANELLA LLP 1800 Avenue of the Stars Suite 900 Los Angeles, CA 90067 | Vincent K. Yip Peter J. Wied PAUL, HASTINGS, JANOFSKY & WALKER LLP 515 South Flower Street, 25 th Floor Los Angeles, CA 90071 |
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/s/ Richard D. Kirk, (rk0922)
Richard D. Kirk

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9. LG Display admits the allegations of paragraph 9 of the Counterclaims.
10. LG Display admits the allegations of paragraph 10 of the Counterclaims.
11. LG Display admits the allegations of paragraph 11 of the Counterclaims.

RESPONSE TO COUNTERCLAIM COUNT I

12. LG Display refers to and incorporates herein its responses to CMO's allegations in paragraphs 1-11, above, as though fully set forth herein.

13. LG Display denies the allegations in paragraph 13 of the Counterclaims.
14. LG Display denies the allegations in paragraph 14 of the Counterclaims.

RESPONSE TO COUNTERCLAIM COUNT II

15. LG Display refers to and incorporates herein its responses to CMO's allegations in paragraphs 1-14, above, as though fully set forth herein.

16. LG Display denies the allegations in paragraph 16 of the Counterclaims.
17. LG Display denies the allegations in paragraph 17 of the Counterclaims.
18. LG Display denies the allegations in paragraph 18 of the Counterclaims.
19. LG Display denies the allegations in paragraph 19 of the Counterclaims.

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